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July 17, 2018

FILED VIA ECF
The Honorable Vince Chhabria
United States District Court
Northern District of California
450 Golden Gate Avenue, Courtroom 4
San Francisco, California 94102

> Re: Application of Norman E. Siegel for Appointment as Lead Counsel, MDL 2843: *In re Facebook, Inc., Consumer Privacy User Profile Litigation*

Dear Judge Chhabria:

In response to your recent order (Doc. 76), I submit the following information in further support of my application for appointment as lead counsel in this matter.

(1) A description of the core team of lawyers the potential lead counsel anticipates will work with her or him. This should include a biography of each anticipated team member.

As mentioned in my initial application, I propose a team from Stueve Siegel that would include the following Stueve Siegel lawyers performing in the specific roles described below. As requested, brief narrative biographies of each team member are attached to this submission. All have served in similar roles in other major data privacy litigation.

- Norman E. Siegel: As stated in my application, I would serve as lead counsel with final responsibilities for strategic decisions in the case, written and oral presentations to the Court, and settlement or trial. As lead counsel I also propose to oversee the distribution of work as needed to other firms commensurate with their skill set and experience, while maintaining the zealous and efficient prosecution of this case consistent with Fed. R. Civ. P. 1.

- Barrett J. Vahle: Mr. Vahle would lead the drafting of pleadings and briefing on key legal issues, including dispositive motions and class certification, and participate in deposition discovery. He would also assist lead counsel in administrative matters, including distribution of work assignments and tracking of time and expense records of all counsel.

- Stephanie Walters: Ms. Walters serves as the firm's dedicated E-Discovery Counsel. She would lead all aspects of electronic discovery, including negotiating preservation and production agreements and case management orders, and

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production, receipt, and review of plaintiff and defendant documents using state-of-the-art methods and technology.

- Lindsay T. Perkins: Ms. Perkins would research and draft substantive briefs, both in this Court and, as applicable, on appeal. She would also serve a key role in strategic decisions tethered to the rapidly evolving law likely to impact this case.

- J. Austin Moore: Mr. Moore would be primarily responsible for drafting, organizing, and conducting offensive discovery directed to Facebook, other defendants, and third parties. He would serve a vital role in synthesizing the relevant facts for presentation to the Court and jury.

- Emily Smith: Ms. Smith would be primarily responsible for vetting clients for the consolidated complaint, coordinating with plaintiffs and their counsel, and responding to defensive discovery directed to named plaintiffs.

The diverse skill set of this team would allow Stueve Siegel to take on this litigation as a sole lead counsel, with the anticipation that I would call on a team of 6-8 lawyers from outside my firm that would include the top lawyers in the data privacy field. I have been fortunate to work with experienced data privacy lawyers in *Equifax*, *Home Depot*, *Target*, *Office of Personnel Management*, and *Anthem*, and believe I can call upon their expertise and resources to build an effective team to take on Facebook and the complex issues presented in this case. Moreover, my firm has been a strong advocate of diversity in leadership and opportunity in multi-district litigation and participated in the creation of the Duke Guidelines and Best Practices Addressing Leadership Positions in the Practice of Law. The working draft of the latest Guidelines provides that counsel should be "sufficiently diverse to effectively serve the needs of all parties in the MDL." As provided in these Guidelines, my commitment would be to form a team that would mirror the wide diversity of the proposed class.

Finally, to the extent the Court is considering a co-lead structure, I am happy to work with any of the finalists in this capacity. I pride myself on congeniality and would be pleased to partner with any of the proposed lead candidates to move the case forward consistent with the Court's expectations.

(2) A list of every Northern District of California case, including the case number and the judge, on which the finalist has served as lead counsel or co-lead counsel, regardless of whether the case was an MDL.

Although I have served as lead counsel in numerous cases throughout the state and federal courts in California and around the country, I have not had the opportunity to serve as lead counsel in any case venued in this district. However, I recently served as lead counsel in two class actions pending in state courts located in the Northern District of California that were both recently brought to a successful resolution:

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Pagoaga v. Stephens Institute d/b/a Academy of Art University, No. CGC 16-551952, San Francisco Superior Court, Judge Curtis E.A. Karnow. This was a data breach case against AAU that was recently brought to a successful resolution providing cash reimbursement for out of pocket losses, credit monitoring, and business practice changes. I argued for final approval of the settlement on July 16, 2018, and expect an order approving the settlement will issue shortly.

Larson v. John Hancock Life Insurance Company, Case No. RG16813803, Alameda County Superior Court, Judge Brad Seligman. This was a case alleging that John Hancock improperly overcharged for the cost of insurance on approximately 100,000 life insurance policies sold throughout the United States. The case settled and was finally approved in May 2018 for $57.75 million following a contested motion on class certification, extensive motion practice and discovery.

In addition to these cases that I have personally handled as lead counsel, my partners have handled cases as lead counsel in this district and I am confident their reputations before the bench in this district reflect the same commitment to zealous representation of the class that I would bring to this litigation. Those cases include:

In re: Wells Fargo Home Mortgage Overtime Pay Litig., No. 06-md-01770, Judge Marilyn Hall Patel. Stueve Siegel partner George Hanson served as lead counsel in this wage-and-hour MDL on behalf of a certified collective of Wells Fargo mortgage officers that led to a $20 million settlement.

In re: Wells Fargo Loan Processors Overtime Litig., No. 07-md-01841, Judge Marilyn Hall Patel and Judge Edward M. Chen. Mr. Hanson was also lead counsel in this subsequent FLSA MDL involving underpaid Wells Fargo loan processors that resulted in a $7.2 settlement for class members.

Leiszler v. Align Technology, Inc., No. 10-cv-02010, Judge Maxine M. Chesney. Stueve Siegel partner Patrick Stueve was lead counsel in this class action, securing a $44 million settlement fund, including nearly $7.8 million in cash relief, for a class of dentists whose certification was revoked by Invisalign.

I look forward to visiting with the Court tomorrow regarding my application and answering any further questions the Court has regarding this matter.

Respectfully submitted,

Norman E. Siegel

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NORMAN E. SIEGEL

Norman E. Siegel is a founding partner of Stueve Siegel Hanson, an AV rated firm with 23 lawyers. The firm has attracted an outstanding roster of lawyers who were trained at major defense firms and have served at high levels of government and public service to represent consumers nationwide. Over the last 25 years, Norm has gained a reputation as a stand-out trial lawyer both locally and nationally. He has successfully tried to verdict a wide range of cases including obtaining multi-million dollar jury verdicts in both class actions and individual disputes. Norm has also been recognized for obtaining some of the largest and most creative settlements in the country, successfully securing relief for tens of millions of class members in a wide variety of cases over the course of his career. Recent accolades include: Super Lawyers (2006-2017) Top 50 Attorneys in Kansas City; US News Tier 1 rankings in 3 categories including Class Action Litigation; Lawdragon Magazine's 500 Leading Plaintiffs' Lawyers in America; and Benchmark Plaintiffs Litigation Star.

Norm was born in Baltimore, Maryland. He received a degree in political science from Tufts University, and his J.D. from Washington University in St. Louis. Prior to starting Stueve Siegel in 2001, Norm served as a Missouri Assistant Attorney General and as a partner at what is now Dentons. Norm has recently served on the Boards of the Healthcare Foundation of Greater Kansas City, the Kansas City Bar Foundation, and the Negro Leagues Baseball Museum. He was the founding co-chair of the American Association for Justice's Consumer Privacy and Data Breach litigation group.

SELECTED PRIVACY AND DATA BREACH LITIGATION EXPERIENCE

In re: Equifax, Inc., Customer Data Security Breach Litig. (N.D. Ga.) As plaintiffs' co-lead counsel and interim class counsel, Norm oversees all aspects of the pending consumer class MDL concerning the largest data breach in American history. Norm and his team recently filed a 575-page consolidated complaint synthesizing the factual allegations and claims from hundreds of cases filed nationwide.

In re: Home Depot Customer Data Security Breach Litig. (N.D. Ga.) Norm, along with Stueve Siegel partner Barrett Vahle, were named lead counsel and participated in all aspects of this case including leading negotiations resulting in a settlement that provided a multi-million dollar cash fund, identity theft protection, and injunctive relief to the settlement class. The case was resolved one year after appointment of lead counsel.

In re: Target Corp. Customer Data Security Breach Litig. (D. Minn.) Norm was named to the Plaintiffs' Steering Committee and represented dozens of named plaintiffs whose data was compromised in the Target data breach. Stueve Siegel drafted large portions of the brief that resulted in the denial of Target's motion to dismiss, and Norm worked with the leadership team to mediate the case to a successful resolution. The Eighth Circuit recently affirmed the class judgment in all respects.

In re: Anthem Data Breach Privacy Litig. (N.D. Cal.) Stueve Siegel represents a dozen named plaintiffs in this nationwide class action stemming from the largest healthcare data breach in history. Stueve Siegel participated in many aspects of the litigation and Norm worked with lead counsel in connection with the negotiations leading to a $115 million settlement.

In re: U.S. Office of Personnel Management Data Security Breach Litig. (D.D.C.) Stueve Siegel represents numerous named plaintiffs in this data breach that impacted over 21 million government employees and job applicants. The stolen records contain a wide range of data including social security numbers, findings from interviews conducted by background investigators, and approximately 5.6 million fingerprints. The case is currently on appeal.

National Board of Examiners in Optometry Data Breach Litig. (D. Md.) Stueve Siegel is prosecuting this action against NBEO—the testing organization for optometrists in the United States. NBEO did not concede that it was subject to a breach, resulting in dismissal for lack of standing. Norm argued the appeal to the Fourth Circuit, which reversed the dismissal in June 2018, announcing new guidelines to establish standing in data breach litigation.

Academy of Art University Data Breach Litig. (Sup. Ct. Cal., San Francisco) Stueve Siegel represents current and former employees of Academy of Art University who had their personal and W2 information, including wage data and social security numbers, compromised in a "phishing" scheme. The case was settled and is pending final approval.

CareCentrix Data Breach Litig. (D. Kan.) Stueve Siegel represented plaintiffs in this phishing case compromising the social security numbers of thousands of CareCentrix employees. The case was settled in December 2017 and included automatic cash payments to class members with fraudulent tax returns, believed to be the first data breach settlement to include this feature.

SELECTED RECENT CLASS TRIALS AND SETTLEMENTS

➢ In June 2018, Norm secured a $34.3 million jury verdict as lead trial counsel in a class action on behalf of Missouri owners of State Farm life insurance policies related to improper charges assessed under the policies. **Vogt v. State Farm Life Ins. Co.**, No. 16-cv-4170 (W.D. Mo.).

➢ In 2017, Stueve Siegel partner Patrick Stueve obtained a $217.7 million jury trial verdict as lead trial counsel on behalf of a class of Kansas farmers against biotech giant Syngenta related to the sale of genetically modified corn seed, leading to a nationwide settlement of $1.51 billion. **In re: Syngenta AG MIR 162 Corn Litig.**, No. 14-md-2591 (D. Kan.).

➢ Stueve Siegel won a landmark $220 million settlement for all Missouri residents who purchased the prescription pain reliever Vioxx before it was removed from the market. **Plubell v. Merck & Co.**, No. 04CV235817-01 (Mo. Cir. Ct.).

➢ Norm was appointed lead counsel and secured a $44.5 million settlement to resolve a class action accusing U.S. Bank of facilitating the theft of customer funds at a now-bankrupt futures merchant. **In re: Peregrine Financial Group Customer Litig.**, No. 12-cv-5546 (N.D. Ill.).

➢ As co-lead counsel, Norm obtained $75 million in settlement relief for purchasers of Hyundai vehicles for Hyundai's overstatement of horsepower in vehicles. **Roy v. Hyundai Motor America**, No. 05-483 (C.D. Cal.).

➢ As co-lead counsel, Norm obtained a $35 million settlement for consumer fraud and antitrust claims brought on behalf of retail purchasers of pre-filled propane tanks. **In re: Pre-Filled Propane Tank Sales Practices Litig.**, No. 09-md-2086 (W.D. Mo.). Norm is co-lead and liaison counsel in a subsequent pending MDL. **In re: Pre-Filled Propane Tank Antitrust Litig.**, No. 14-md-0567 (W.D. Mo.).

➢ Norm was lead counsel and obtained a $25.4 million settlement for purchasers of H&R Block's Express IRA product related to allegedly false representations made during the sales presentation. **In re: H&R Block, Inc., Express IRA Mktg. Litig.**, No. 06-md-1786 (W.D. Mo.).

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BARRETT J. VAHLE

After beginning his practice at a national defense firm, Barrett Vahle has committed the last decade to representing plaintiffs of all types and sizes in contingency litigation. He has successfully represented large corporations in antitrust litigation against suppliers, dozens of jet purchasers in suits against an aerospace manufacturer, and worked on behalf of consumers and employees in scores of class and collective actions. Since the revelation of the Target data breach in late 2013, much of Barrett's practice has been dedicated to representing victims of data breaches.

Barrett was appointed as co-lead counsel in *In re: The Home Depot, Inc. Customer Data Security Breach Litigation*, where he participated in all aspects of that case on behalf of consumers, argued the motion to dismiss in the Northern District of Georgia, and shepherded the class settlement through approval and administration. He recently served as lead counsel and settlement class counsel in a data breach action involving phishing of employee W-2 information. After defeating a motion to dismiss raising important issues of Article III standing and negligence duty, *Hapka v. CareCentrix, Inc.*, No. 16-2372-CM, 2016 WL 7336407 (D. Kan. Dec. 19, 2016), Barrett negotiated a class settlement that included automatic cash payments for instances of tax fraud, along with credit monitoring and other relief. In the current *In re: Equifax Customer Data Security Breach Litigation*, Barrett was the lead drafter of the 559-page consolidated complaint, helps lead the briefing committee, and manages the periodic submission of time and expense reports to the district court.

Before joining the firm in 2009, Barrett practiced in the Kansas City office of Sonnenschein Nath & Rosenthal LLP (now known as Dentons), one of the largest law firms in the country. At Sonnenschein, Barrett concentrated his practice in business litigation, trade secret and non-compete litigation, white collar criminal defense, and appellate practice. In his first jury trial, his clients were acquitted of federal mortgage fraud charges. He was also second chair and responsible for factual development and briefing in the landmark capital-murder habeas case *Thomas v. Allen*, 614 F. Supp. 2d 1257 (N.D. Ala. 2009), *affirmed* 607 F.3d 749 (11th Cir. 2010), where after a bench trial the district court found that an inmate was mentally retarded and thus ineligible for execution under *Atkins v. Virginia*, 536 U.S. 304 (2002).

In 2004, Barrett obtained his J.D., with highest honors (graduating first in his class) from the University of Missouri − Columbia. During law school, he was Editor-in-Chief of the *Missouri Law Review*, and received the Judge Shepard Barclay Prize for the graduating law student "who has attained the highest standing in scholarship and moral leadership." After law school, Barrett was a law clerk for the Honorable Duane Benton of the United States Court of Appeals for the Eighth Circuit, and then for Judge Dean Whipple of the United States District Court for the Western District of Missouri. Barrett has been selected as a *Super Lawyer* every year since 2013. He is the co-chair of the Data Breach Subcommittee of the Commercial and Business Litigation Committee of the ABA Litigation Section, and is an active member of the American Association for Justice's Consumer Privacy and Data Breach Litigation Group.

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STEPHANIE WALTERS

Stephanie Walters serves as e-Discovery Counsel at Stueve Siegel Hanson LLP. She has been practicing in the area of electronic discovery for ten years and is viewed as an expert in the field. As e-Discovery Counsel, Stephanie oversees and coordinates Stueve Siegel Hanson's document collection, review, and production in all of the firm's large-scale, complex matters.

Stephanie has substantial experience managing and analyzing documents produced by defendants in antitrust cases, consumer class actions, mass torts cases and personal injury cases. She also has experience managing forensic collection, review and production of documents for corporate and individual plaintiffs.

Stephanie recently oversaw class plaintiffs' discovery efforts in highly-complex multi-district litigation involving a biotech defendant in the U.S. District Court for the District of Kansas, *In re: Syngenta Ag Mir162 Corn Litigation*, MDL No. 2591. There, Stephanie led efforts including the identification, collection, review and production of documents for thousands of farmer plaintiffs and managed the review of all documents produced by the defendants, the non-producer parties, and numerous third parties. Stephanie assisted in negotiating search terms and protocols relevant to that discovery with the primary defendant and with various third parties that ultimately resulted in the production and review of over 3.2 million pages of documents.

Stephanie is currently serving in a similar capacity in the *In re: Taxotere (Docetaxel) Products Liability Litigation* (E.D. La.), where she was appointed by MDL leadership to participate in ESI protocol and search term negotiations and to manage attorney document review teams.

Stephanie attends the Sedona Conference annually and is a current member of the Sedona Conference Working Group on Electronic Document Retention and Production. She has recently been appointed to the Sedona Conference drafting team to create a commentary titled "*Litigating at the Intersection of Sedona Principle 6 and Cooperation & Transparency: Guidance on How to Find the Right Balance*." She also authored and regularly updates a section regarding e-Discovery for the Missouri Bar Discovery Deskbook. Stephanie regularly attends the New York LegalTech conference, the National eDiscovery Leadership Institute, the Complex Litigation E-Discovery Forum and has participated in the Georgetown e-Discovery Training Academy.

In addition to her case work, Stephanie counsels attorneys on electronic discovery issues including preservation, collection, search term negotiation, document review, ESI production, e-discovery software, and forms of production. She routinely work with e-discovery vendors in her practice and works in a variety of document review platforms including Summation, iConect Xera, Relativity, Kaleidoscope, Cicayda and CasePoint. Prior to serving as e-Discovery Counsel at Stueve Siegel Hanson, Stephanie worked to develop a vendor's document review department and led document review teams of 40+ attorneys in various cases from initial intake through review and document production.

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LINDSAY PERKINS

Lindsay Todd Perkins joined Stueve Siegel Hanson as of counsel in 2013 and practices consumer and commercial litigation, wage and hour, antitrust, and personal injury litigation. She has worked on several of the firm's data breach cases, including nationwide class actions against Target, Home Depot, the Office of Personnel Management, and the National Board of Examiners in Optometry.

In the firm's case against the National Board of Examiners in Optometry, Lindsay interviewed and vetted hundreds of optometrist victims, drafted the consolidated complaint, and played a lead role drafting the briefs to the Fourth Circuit Court of Appeals, resulting in a published opinion vacating the district court's order dismissing the case on Article III standing grounds, and remanding for further proceedings. *See Hutton v. Nat'l Bd. of Examiners in Optometry, Inc.*, 892 F.3d 613 (4th Cir. 2018).

Recently, Lindsay was an important member of the trial team that secured a $34.3 million jury verdict for a class of Missouri life insurance policyholders against State Farm Life Insurance Company alleging State Farm breached the cost of insurance provisions of their policies. *See Vogt v. State Farm Life Ins. Co.*, Case No. 16-4170-CV-C-NKL (W.D. Mo.). She also was an instrumental contributor in drafting the appellee brief to the Tenth Circuit Court of Appeals defending a jury verdict for a class and collective of employees alleging federal and state wage and hour violations against Tyson Foods, resulting in a published opinion affirming that verdict. *See Garcia v. Tyson Foods, Inc.*, 770 F.3d 1300 (10th Cir. 2014).

Lindsay has been named by *Super Lawyers* as a "Rising Star" from 2012-2017. She is admitted to practice in the states of Missouri and Kansas. Lindsay is active in her legal community, serving on the board of the Lawyers Association of Kansas City as President-Elect. Prior to joining Stueve Siegel Hanson, Lindsay practiced commercial and employment litigation at the law firm of Spencer Fane Britt & Browne LLP. Lindsay was primarily responsible for drafting the briefs to the Missouri Court of Appeals that resulted in an important clarification of law relating to co-employee liability. *See Hansen v. Ritter*, 375 S.W.3d 201 (Mo. Ct. App. 2012).

Lindsay graduated first in her law school class in 2007 at the University of Missouri in Kansas City. She was the Editor-in-Chief of the *UMKC Law Review*, and was a member of the National Moot Court team. After law school, Lindsay served as a law clerk to the Honorable Ortrie D. Smith, U.S. District Judge for the Western District of Missouri, and then for the Honorable Duane Benton of the United States Court of Appeals for the Eighth Circuit.

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AUSTIN MOORE

Austin Moore has dedicated a significant portion of his practice to prosecuting consumer class actions on behalf of victims of privacy violations and data breaches. Austin was a key member of the leadership group in *In re: Target Consumer Data Security Breach Litigation* (D. Minn.), where he led nationwide plaintiff vetting efforts and served as the "liaison" attorney responsible for communicating between the lead firms and other attorneys representing named plaintiffs in the litigation. Austin was asked by lead counsel to perform a similar role in the *In re: Anthem, Inc., Data Breach Litigation* (N.D. Ca.), where he was responsible for overseeing a plaintiff vetting process that resulted in the selection of over 100 named plaintiffs from nearly every state to serve as class representatives.

Austin was also instrumental in the *In re: The Home Depot, Inc. Customer Data Security Breach Litigation* (N.D. Ga.), where he was in charge of the team of attorneys tasked with investigating the case and handling all substantive briefing in the consumer track of the litigation, and served as the primary drafter of the consolidated complaint and opposition to defendant's motion to dismiss. Austin is serving in a similar capacity in the *In re: Equifax Data Security Breach Litigation* (N.D. Ga.), where he is leading factual investigation efforts and was responsible for drafting the factual narrative in the 559-page consolidated complaint.

In addition to multi-district litigation, Austin has served as counsel in data breach class actions against *CareCentrix, Inc.*, in the District of Kansas (final approval granted in February 2018), *Academy of Art University* in the Superior Court of California, County of San Francisco (final approval of settlement pending), and the *National Board of Examiners in Optometry* in the District of Maryland (case currently proceeding in district court after successful appeal to U.S. Court of Appeals for Fourth Circuit). Austin also maintains an active appellate practice and has prevailed in multiple appeals benefiting class action plaintiffs on issues relating to arbitration. *See, e.g.*, *Moss v. First Premier Bank*, 835 F. 3d 260 (2d. Cir. 2016) (Austin briefed and argued appeal resulting in published opinion declining to appoint arbitrator and permitting class action to proceed in federal court); *Parm v. National Bank of California*, 835 F. 3d 1331 (11th Cir. 2016) (published opinion declining to enforce tribal arbitration agreement because it required the parties to arbitrate before "an illusory and unavailable arbitral forum.").

Austin is a 2011 graduate of the Washington University School of Law in St. Louis where he was an editor of the Washington University Journal of Law & Policy and recipient of the Mary Collier Hitchcock Prize, awarded to one student annually for outstanding legal writing. Austin received his B.A. in Political Science from the University of Mississippi, where he graduated *summa cum laude* and was selected as a member of Phi Beta Kappa. Austin has been selected by *Super Lawyers* as a Missouri & Kansas "Rising Star" in class action litigation every year since 2015, and was named an "Up and Coming Lawyer" by *Missouri Lawyers Weekly* in 2016. Austin currently holds a committee leadership position in the Federal Courts Advocates Section of the Kansas City Metropolitan Bar Association, where he is tasked with promoting interaction, professional development, and education between federal court practicers and the federal judiciary.

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EMILY SMITH

Emily Smith joined Stueve Siegel Hanson as an associate in 2016. Since that time, Emily has worked almost exclusively representing consumers in multi-jurisdictional class and collective actions, particularly in the field of labor and employment law and in data breach and privacy litigation.

As part of her practice, Emily has engaged in the drafting of pleadings, motion practice, extensive fact discovery, and the managing of settlement proceedings. This has included serving in integral roles in sprawling nationwide litigation against DIRECTV for violations of the Fair Labor Standards Act, in which Emily has helped manage the nearly 3,000 clients in a collective action, *Arndt et al. v. DIRECTV, Inc.* (AAA), as well as hundreds of individual cases across the country filed in more than 35 federal courts, the American Arbitration Association, and JAMS.

Emily has served as a primary client contact through all stages of the litigation, including discovery and settlement, in support of the plaintiffs' claims, including minimum wage, overtime, and misclassification violations against DIRECTV and its affiliated companies. Emily is currently working on the pending MDL *In re: Equifax Data Security Breach Litigation* (N.D. Ga.), in which she has worked extensively with lead plaintiffs' counsel and directly with the plaintiffs themselves to handle intake and vetting of hundreds of plaintiffs from all 50 states for consideration as class representatives in the consolidated proceedings, to consolidate the claims into a single consolidated complaint, and to comply with ongoing discovery requests.

Emily earned her J.D. from the University of Kansas School of Law in 2014. After law school, Emily interned for the Honorable David J. Waxse in the United States District Court for the District of Kansas, researching and drafting memoranda and opinions on a variety of procedural matters.